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Department Stores, Inc.  
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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SOUTHERN DIVISION**

11 SASHA SUCHITE,

Plaintiff,

13  
14 v.

15 KOHL'S DEPARTMENT STORES,  
INC.,

16  
17 Defendant.

Case No. 8:15-cv-01535-JLS-DFM  
(Hon. Josephine L. Staton)

**JOINT STIPULATION EXTENDING  
TIME TO COMPLETE DISCOVERY**

*[Lee Decl. and [Proposed] Order filed  
concurrently herewith]*

FAC Filed: Oct. 27, 2015  
Trial Set: Jan. 24, 2017

1 Plaintiff Sasha Suchite (“Plaintiff”) and Defendant Kohl’s Department Stores,  
2 Inc. (“Defendant”), by and through their respective counsel, hereby stipulate as  
3 follows:

4 WHEREAS, Plaintiff filed a Complaint on September 23, 2015 (ECF No. 1)  
5 and a First Amended Complaint against Kohl’s Department Stores, Inc. on October  
6 27, 2015 (ECF No. 10);

7 WHEREAS, on February 10, 2016, this Court issued a Scheduling Order,  
8 setting a Fact Discovery Cut-Off Date of August 30, 2016 (ECF No. 17);

9 WHEREAS, on July 1, 2016, a Second Amended Motion to Transfer Related  
10 Actions to the Northern District of Illinois Pursuant to 28 U.S.C. §1407 For  
11 Consolidated Pretrial Proceedings was filed with the Judicial Panel on Multidistrict  
12 Litigation (“JPML”) requesting that this action, along with twenty-seven other  
13 actions, be considered for inclusion in a new proposed Multidistrict Litigation 2736  
14 (MDL 2376, ECF No. 6);

15 WHEREAS, the parties have worked diligently to request discovery and  
16 provide responses to same, and are further working towards an amicable resolution  
17 of the case (Lee Decl. ¶ 3);

18 WHEREAS, the parties believe that extending the time to complete discovery  
19 by 30 days would allow the parties to better assess what discovery remains to be  
20 completed, whether to request to stay this action pending a determination by the  
21 JPML, and moreover would allow the parties to work towards a final resolution of  
22 this matter (Lee Decl. ¶ 6);

23 WHEREAS, the parties have not previously sought an extension of time to  
24 complete discovery in this matter; and

25 WHEREAS, Plaintiff and Defendant have met and conferred and hereby  
26 stipulate to extend the time within which to complete discovery until by thirty (30)  
27 days until September 30, 2016, subject to the Court’s approval:

1 IT IS HEREBY STIPULATED AND AGREED that, subject to Court  
2 approval, the Fact Discovery Cut-Off Date shall be continued thirty (30) days to  
3 September 30, 2016.

4  
5 DATED: August 29, 2016

KELLEY DRYE & WARREN LLP  
Catherine D. Lee

7 By: /s/ Catherine D. Lee  
8 Catherine D. Lee  
9 Attorneys for Defendant Kohl's  
Department Stores, Inc.

10  
11 DATED: August 29, 2016

KROHN & MOSS, LTD.  
Taylor M. Tieman  
Adam T. Hill

13 By: /s/ Taylor M. Tieman  
14 Taylor M. Tieman  
15 Attorneys for Plaintiff Sasha Suchite

1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed,  
2 and on whose behalf the filing is submitted, concur in the filing of this stipulation  
3 and have authorized the filing of this stipulation.  
4

5 DATED: August 29, 2016

KELLEY DRYE & WARREN LLP  
Catherine D. Lee

7 By: /s/ Catherine D. Lee  
8 Catherine D. Lee  
9 Attorneys for Defendant Kohl's  
Department Stores, Inc.